

Exhibit 2

**to the Declaration of Adam B. Silverman in
Support of the Objections of Certain
Defendants to the Admission of Certain
Exhibits Cited in Plaintiffs and NCR
Corporation's Responsive Post-Trial Briefs**

Silverman, Adam (Assoc-Phil-Env)

From: Brittany Sukiennik [bsukiennik@cravath.com]
Sent: Thursday, November 29, 2012 11:28 AM
To: Furrie, Kristin (ENRD)
Cc: Cross, Anna (ENRD); Holmes, Caleb J. (Assoc-Phi-ENV); Abela, Maya (ENRD); Silverman, Adam (Assoc-Phil-Env); Majumdar, Sumona (ENRD); 'vlavely@cravath.com'; kfalahee@sidley.com
Subject: Re: US v NCR - Proposed Exhibit Meeting
Attachments: Combined Exhibits - Objections Only.xlsx

All,

Sumona, Caleb, Adam and I spoke this morning, and I let them know that Kate had taken the combined exhibit list and organized it by exhibit type, in order to make negotiations about exhibit objections easier to handle. That spreadsheet is attached below, and the key to the color coding is on Tab 2. Our understanding was that the purpose of the meeting today was to do something along these lines, so unless anyone disagrees, we probably do not need to get together at 4:00 to discuss an exhibit negotiation strategy. We are available to meet on Saturday to try to resolve some of these objections. Please let me know if you have any questions. Thanks!

Brittany Sukiennik
 Cravath, Swaine & Moore LLP
 825 8th Avenue, 3946D
 New York, NY 10019
 Tel: (212) 474-1828
 Fax: (212) 474-3700

From: "Furrie, Kristin (ENRD)" <Kristin.Furrie@usdoj.gov>
 To: "'holmes@gtlaw.com'" <holmes@gtlaw.com>, "bsukiennik@cravath.com" <bsukiennik@cravath.com>, "vlavely@cravath.com" <vlavely@cravath.com>, "silvermana@gtlaw.com" <silvermana@gtlaw.com>, "Abela, Maya (ENRD)" <Maya.Abel@usdoj.gov>, "Majumdar, Sumona (ENRD)" <Sumona.Majumdar@usdoj.gov>, "Cross, Anna (ENRD)" <Anna.Cross@usdoj.gov>
 Date: 11/28/2012 12:30 PM
 Subject: US v NCR - Proposed Exhibit Meeting

Hi all,

Caleb, Vanessa, and I discussed have an exhibit meeting tomorrow afternoon at 4:00 at Quarles and Brady to develop a game plan to deal with the exhibit objections. By that time, we should have a consolidated list of both sides objections and we can try to identify ways to handle categories of documents (or identify categories).

Does that work for people (Including Plaintiffs people who I didn't consult with on timing)?

Thanks
 Kristin

Kristin M. Furrie

Trial Attorney
Environmental Enforcement Section
U.S. Department of Justice
(202) 616-6515
kristin.furrie@usdoj.gov

This e-mail is confidential and may be privileged. Use or disclosure of it by anyone